

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA
SACRAMENTO DIVISION

FILED

DEC 19 2022

CLERK, U.S. DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
BY AMC
DEPUTY CLERK

JOSEPH ANTHONY STAFFORD,

Plaintiff,

v.

DOSS, et al.,

Defendant.

2:16-CV-01403-DAD-DMC

Added Witness

Randal Williams

Joseph Stafford
3502 Moorland Ave
Santa Rosa CA 95407

Date : 12 - 15 - 22



Joseph Tony Stafford
3502 Moorland Ave
Santa Rosa CA 95407
Phone number: (707) 867-9130

RE: No. 2:16-CV-1403-DMC

December 15, 2022

CDCR c/o Attorney General
1300 I Street, suite 125
PO BOX 944255, Sacramento, CA 94244-2550
Attn: DAG Brian S. Chan

The undersigned hereby demands that you: Settlement payment of \$800,000 for the violation of my Constitutional rights, for retaliation, and for pain and suffering.

Under the First Amendment, a citizen has the right [to free expression] [to petition the government] [to access the courts] [other applicable right]. I will establish the defendants deprived the plaintiff of this First Amendment right, the plaintiff has proven the following additional elements by a preponderance of the evidence:

What will be proved at trial.

1. that each defendant acted under color of state law; and the plaintiff was engaged in a constitutionally protected activity
2. the [act[s]] [failure to act] of the defendant deprived the plaintiff of [his] particular rights under [the laws of the United States] [the United States Constitution] & the defendant's actions against the plaintiff would chill a person of ordinary firmness from continuing to engage in the protected activity.
3. that each defendant had knowledge of the complaint and willfully chose to participate in retaliatory actions. [establish both causation-in-fact and proximate causation] & the plaintiff's protected activity was a substantial or motivating factor in the defendant's conduct.
4. that prior to the sexual misconduct complaint against CO Doss Plaintiff only had positive interactions for years with the defendants and only after exercising Plaintiffs constitutional right to file a complaint Plaintiff immediately was harassed and punished by the defendants' each day & multiple times daily. Only stopping when Internal Investigating Squad at CDCR Solano Lt. Brown moved Plaintiff out of the Prison for Plaintiffs "safety from staff" retaliating on the Plaintiff. (the "Action")

Yours sincerely,



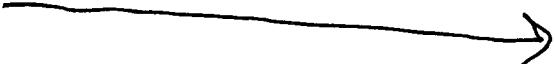
Joseph Tony Stafford

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Copies have been sent through US mail to both parties

Clerk of the United States District Court
Eastern District of California
501 "I" Street Suite 4-200
Sacramento CA 95814-2322
Sacramento CA 94244-2250

Office of the Attorney General
Attn: Brian Chan
1300 "I" Street Suite 125
PO BOX 944255

- 
- 1) added witness
 - 2) Demand letter



Joseph Stafford

12-15-22